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Attorneys for Defendant TV One, LLC

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

GOODNESS FILMS, LLC, a California
Limited Liability Company; HERBERT
HUDSON, an individual; PAUL
GOLDSBY, an individual; and
KENNEDY GOLDSBY, an individual,

Plaintiffs,

v.

TV ONE, LLC, a Maryland Limited
Liability Company; MIGUEL A. NUÑEZ,
JR., an individual; and EDWIN B. "ED."
WEINBERGER, an individual,

Defendants.

CV No. 12-08688-GW (JEMx)

**TV ONE LLC'S NOTICE OF
MOTION FOR LEAVE TO FILE
THIRD-PARTY COMPLAINT
AGAINST MY BELLES LLC**

**[Filed concurrently with Motion;
Memorandum of Points and
Authorities; and [Proposed] Order]**

Date: June 27, 2013
Time: 8:30 a.m.
Judge: Hon. George H. Wu
Crtrm: 10

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on June 27, 2013, at 8:30 a.m., or as soon
thereafter as counsel may be heard before the Honorable George H. Wu in Courtroom
10 of the United States District Court for the Central District of California, at 312 N.
Spring Street, Los Angeles, California 90012, Defendant TV One, LLC ("TV One"),
as Third-Party Plaintiff, by and through its attorneys, Nixon Peabody LLP, submits this

1 Motion for Leave to File and Serve the Summons and Third-Party Complaint
 2 (“Motion”) against My Belles LLC (“My Belles”).

3 This Motion is made pursuant to Federal Rule of Civil Procedure 14(a) on the
 4 grounds that My Belles LLC is contractually liable to indemnify TV One for any
 5 damages or costs incurred by TV One as a result of this action. This Motion is based
 6 on the accompanying memorandum of points and authorities, the attached Third-Party
 7 Complaint, all pleadings and files on record in this case, and any other written or oral
 8 arguments and authorities as may be presented at or before the hearing on this matter.

9 In keeping with Local Rule 7-3, counsel for TV One contacted all parties to
 10 inform them of its intention to file this motion. Plaintiffs stated that that they will not
 11 oppose this Motion. Defendants Weinberger and Núñez informed TV One that they
 12 take no position on this Motion.

13
 14 DATED: May 17, 2013

Respectfully submitted,

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 16 **NIXON PEABODY LLP**

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 18 By: /s/Thaddeus J. Stauber

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